



San Joaquin River Group

- Modesto Irrigation District
- Turlock Irrigation District
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- Merced Irrigation District
- Oakdale Irrigation District
- Friant Water Authority
- City and County of San Francisco

23 April 2010

Gail Cismowski, Environmental Scientist
Ag Regulatory and Planning Unit
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6289

SUBJECT: Selenium Control Program Basin Plan Amendment

The San Joaquin River Group Authority (SJRGa) supports the adoption of the proposed amendment to the Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Basin Plan) to modify the compliance time schedule for the discharge of selenium-laden drainage water to Mud Slough (north), a tributary to the San Joaquin River from the Grasslands sub-basin. Efforts thus far by the Drainage Authority and the Grassland Area Farmers (GAF) have significantly improved water quality in the San Joaquin River. Through no fault of their own, the economic downturn and the cutbacks in water supplies available to the Westside have delayed the completion of the drainage reduction plans. We believe it is reasonable and prudent to extend the compliance period as the water code clearly states that the Board is to consider economic factors in establishing a compliance time schedule.

Any future efforts to reduce drainage discharges are likely to also improve salinity conditions in the river. We would expect that the Drainage Authority and the GAF will continue to work with others in the basin as we all attempt to develop a long-term salinity management plan for the San Joaquin River.

When considering adoption of the amendment, we would also recommend that the Board consider a revision to Table IV-4 in the proposed amendment to ensure that the wording is consistent with the environmental documentation. Those documents state that the only water bodies continuing to be impacted by the drainage water discharges will be the six-mile stretch of Mud Slough (north) and the San Joaquin River from the Mud Slough (north) confluence with the San Joaquin River to the Merced River inflow. This change would provide continued water quality protection for the San Joaquin River Restoration Flows that will be in this reach of the River during the compliance time period. Our proposed wording changes for Table IV-4 are attached.

We also concur with the National Marine Fisheries Service determination that the proposed action by the Board will not adversely affect the Chinook salmon habitat in the San Joaquin River.

If you have any questions regarding our comments, please contact me (530) 758-8633.

Original Signed by

Dennis W. Westcot
Project Administrator

Cc: SJRGa Managers (via e-mail)
Dan Nelson, SLDMWA (via e-mail)

Attachment Describing Specific Recommended Wording Changes to Table IV-4

1. Under the column entitled “Water Body/Water Year Type”, we recommend that you strike the words “Water Year Type” from the column heading as no water year types are considered in the Table. Thus it would read as follows: Water Body/~~Water Year Type~~
2. In the third row of the same column, we recommend that you strike all the wording. The selenium objective for the San Joaquin River below the Merced River is already in place and no compliance time schedule is needed. Thus it would read as follows: ~~San Joaquin River below the Merced River: Critical, Dry, and Below Normal Water Year Types~~
3. In the fourth row, change the wording to reflect the current environmental documentation. Thus it would read as follows: Mud Slough (north) and the San Joaquin River from ~~Sack Dam~~ the Mud Slough Confluence to the Merced River. At present, the table defines the San Joaquin River portion to be from Sack Dam to the Merced River Confluence.